

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

SHAWN DRUMGOLD,  
Plaintiff

V.

TIMOTHY CALLAHAN, FRANCIS  
M. ROACHE, PAUL MURPHY,  
RICHARD WALSH and THE CITY  
OF BOSTON,  
Defendants

04-CV-11193-NG

**ASSENTED TO MOTION FOR LEAVE TO ENLARGE TIME TO FILE  
ANSWERS OR DISPOSITIVE PLEADINGS**

Now come the defendants, Francis M. Roache and the City of Boston, parties in the above-entitled civil action through their counsel pursuant to F.R.C.P. Rule 6(b)(1) and hereby request that this Honorable Court grant leave to file Answers of Defendants Francis M. Roache and the City of Boston until January 7, 2005.

As grounds for this motion, the Defendants state as follows:

1. That prior to filing their responsive pleadings with the Court, Defendants Roache and the City of Boston need additional time to investigate and assemble the voluminous record from the underlying proceedings in order to sufficiently respond to the allegations made by the Plaintiff in his Complaint;

2. That if this Honorable Court were to allow Defendants' motion for an enlargement of time for the filing of their responsive pleadings, it is unlikely Plaintiff would in any way be prejudiced.

3. That to the best of the Defendants' knowledge, Defendant Timothy Callahan continues to be unavailable as he remains deployed abroad in the service of the armed forces of the United States in the operational theater of Afghanistan.

4. That this request is both reasonable and necessary in order for the Defendants Roache and the City of Boston to respond to the Plaintiff's allegations in their Answers.

5. That Plaintiff's counsel has assented counsel to this Motion.

WHEREFORE, the parties respectfully request this Honorable Court enlarge the time in which Defendants the City of Boston and Francis M. Roache must file their Answers in this matter no later than January 7, 2005.

Assented to by,

Plaintiff, Shawn Drumgold  
By his attorneys,

//S//Stephen Hrones  
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Hrones and Garrity  
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(617) 227-4019

Respectfully submitted,

Defendants, the City of Boston and  
Francis M. Roache  
By their attorneys,

//S//John P. Roache  
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//S//Rosemary Curran Scappicchio  
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(617) 263-7400

Dated: November 24, 2004

**DEFENDANTS' CERTIFICATION PURSUANT TO  
LOCAL RULE 7.1(A)(2)**

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I hereby certify, pursuant to Local Rule 7.1(A)(2), that counsel for the Defendants, the City of Boston and Francis M. Roache, has conferred with Stephen Hrones, counsel for the Plaintiff in the above-entitled action, in a good faith attempt to resolve or narrow the issues raised by the instant motions, and that counsel for the Plaintiff has no opposition to the within motion.

//S//John P. Roache

John P. Roache, BBO#421680